

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES	:	
	:	Case No. 1:20-CR-100
v.	:	
	:	
FELICIA DONALD	:	
	:	
Defendant	:	

OBJECTION TO PRESENTENCE REPORT

COMES NOW, Felicia Donald, by and through her recently substituted counsel, and objects to the PreSentence Report in her case, *in toto*. Defense counsel received a copy of the Report from prior counsel last week but has not been able to review it with Ms. Donald due to circumstances not within our full control. In person visitation is not currently available at the Alexandria ADC. Counsel is not be able to decide what course is best to follow in this case at this early juncture since counsel has not had sufficient time to effectively review the very voluminous discovery from the prosecution, nor conduct its own required investigation into the case. Counsel wishes to provide effective assistance, as they are obligated to do, but that requires time to be sufficiently informed of the facts from both a prosecution and defense perspective and how they interact with the applicable law.

Therefore, in order not to waive any appropriate objection, and given the current 3 August 2020 deadline, counsel objects to the entire Report at this time and reserves the

right to supplement this position after appropriately reviewing the record, conducting a defense investigation into the case, and researching the application of the law to the facts.

It is respectfully requested that the dates regarding the Report be adjusted to coincide with the additional time to prepare counsel has requested in their motion to reschedule the 21 August 2020 court date. That motion and supporting authority are adopted and incorporated, by specific reference, herein.

FELICIA DONALD
By Counsel

/S/
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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of July 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, sending a notification of such filing to Assistant US Attorney Raj Parekh.

/S/
MARVIN D. MILLER